

Exhibit C

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LAUREL CLEVINGER,

Plaintiff,

v.

META PLATFORMS, INC., FACEBOOK
HOLDINGS, LLC, FACEBOOK OPERATIONS,
LLC, FACEBOOK PAYMENTS, INC.,
FACEBOOK TECHNOLOGIES, LLC,
INSTAGRAM, LLC, & SICULUS, INC., SNAP,
INC., BYTEDANCE, LTD, BYTEDANCE,
INC., TIKTOK, LTD, TIKTOK, LLC, TIKTOK,
INC.,

Defendants.

Member Case No. 4:22-cv-06457

Case No. 4:22-MD-03047-YGR

MDL No. 3047

DECLARATION OF MICHAEL CIARAMITARO

1. My name is Michael Ciaramitaro, I am over the age of 18 and am competent to testify. I have personal knowledge of the matters contained in this Declaration and, if called upon as a witness, could and would competently testify thereto.

2. I hold a Bachelor of Science degree in Business Management from the Pepperdine Graziadio School of Business and Management.

3. I have over 20 years of experience in computer forensics and electronic discovery and have provided testimony in dozens of matters pertaining to collecting and analyzing ESI. I have offered expert testimony in the areas of data collection related to email, social media, enterprise data systems, cloud data, computers, databases, and mobile devices. I have consulted as an ESI expert in numerous matters involving complex litigation and electronic data.

4. I obtained my EnCase Certified Examiner (“EnCE”)¹ through Guidance Software in 2002 and have maintained my knowledge in computer forensics through hundreds of hours of classroom training over the course of the last 20 years.

5. I am the Vice President of Technical Operations and Digital Forensics for International Litigation Services, Inc. (“ILS”). ILS is an electronic discovery company specializing in, among other things, forensic collection, processing, and hosting of electronically stored information (“ESI”) from various data systems, including mobile devices, email systems, document collaboration systems, social media, computers, flash drives, and database systems.

6. Under my supervision and oversight, ILS met with Laurel Clevenger on May 6, 2024, on or around 7:15 AM ET via Zoom. Ms. Clevenger provided ILS access to the ESI data sources listed herein, data collections were initiated, on or around May 6th 2024, and data was subsequently downloaded as it was made available by the provider:

- a. Email (laurelclevenger@gmail.com)
- b. Discord (larrythelobster._.)
- c. iCloud iPhone Backup of an iPhone SN: VRH4D42X9R from two backup dates; 5/1/2024 and 5/6/2024, associated with iCloud account laurelclevenger@gmail.com
- d. Data collection from mypennmedicine.org associated with phone number 540-450-6586
- e. Download Your Information (“DYI”) data from Facebook account associated with laurelclevenger@gmail.com

¹ EnCE certification is a widely respected credential for forensic professionals. It certifies proficiency in the use of EnCase, which was a pioneering tool for forensic collection and examination and remains a key component of most forensic professionals’ tool kits.

- f. Google Drive and YouTube Takeout associated with laurelclevenger@gmail.com
- g. Instagram (@Brycie.1.2.3)
- h. Instagram (@Bryicicle.s_art)
- i. LinkedIn DYI (laurelclevenger@gmail.com)
- j. Pinterest.com DYI (clevenger0909)
- k. TikTok (@brycie69)

7. During the Zoom call referenced in ¶6, ILS met with Ms. Clevenger and representatives from the Beasley Allen law firm as well as ILS litigation consultant Tony Chu, Esq.

8. Over the course of 8 weeks, ILS continued to work with Ms. Clevenger to complete the collection of the data sources referenced in ¶6 until all data was collected.

9. ILS also performed the collection of the following data sources outside of the data sources listed in ¶6, as follows:

- a. April 30, 2024, ILS initiated the collection of Website <https://lbcartportfolio.weebly.com/>.
- b. Between May 16 and 17, 2024, ILS initiated the collection of 101 mychart.jefferson.edu web page links.
- c. On May 30, 2024, ILS initiated the collection of 51 web pages from steamcommunity.com and store.steampowered.com.
- d. On May 31, 2024, ILS initiated the collection of data of the following accounts:
 - i. Garmin account associated with laurelclevenger@gmail.com.
 - ii. Fitbit account associated with laurelclevenger@gmail.com.

iii. Hulu account associated with laurelclevenger@gmail.com.

iv. myfitnesspal.com account associated with laurelclevenger@gmail.com.

e. On June 5, 2024, ILS initiated the collection of Email and other Microsoft web Account information associated with laurelclevenger@gmail.com and l1aurel1234@outlook.com.

f. On June 28, 2024, ILS initiated the collection of Microsoft web Account information associated with laurelclevenger@icloud.com.

10. All data referenced above was immediately stored on a secure ILS Forensic file server upon completion of data collection, where it is maintained as of the date of this Affidavit.

I declare, under penalty of perjury under the laws of the State of ^{Arizona}_____, and pursuant to 28 U.S.C. § 1746, that the above statements are true and correct to the best of my knowledge, information, and belief.

This the ²¹_____ day of ^{August}_____, 2024.



Michael Ciaramitaro

ILS Inc.

Vice President of Information Operations and Digital Forensics


SIGNATURE CERTIFICATE



REFERENCE NUMBER
3AA930CF-D1C1-401C-8257-B5B27E005516

TRANSACTION DETAILS	DOCUMENT DETAILS
Reference Number 3AA930CF-D1C1-401C-8257-B5B27E005516	Document Name Michael Ciaramitaro - Affidavit Ciaramitaro Edit 20240819 V2 +SHC
Transaction Type Signature Request	Filename Michael_Ciaramitaro_-_Affidavit_Ciaramitaro_Edit_20240819_V2_+SHC.pdf
Sent At 08/21/2024 10:52 EDT	Pages 4 pages
Executed At 08/21/2024 12:48 EDT	Content Type application/pdf
Identity Method email	File Size 151 KB
Distribution Method email	Original Checksum f19a01451e48119ddcc1f34e3248442f44ef1402499bfcadde945af6ee2a520e
Signed Checksum 8deae0035d43120b223e0b1bdd25084d446212e5c7e1f720d327764fe5f156d9	
Signer Sequencing Disabled	
Document Passcode Disabled	

SIGNERS

SIGNER	E-SIGNATURE	EVENTS
Name Michael Ciaramitaro	Status signed	Viewed At 08/21/2024 12:48 EDT
Email mciaramitaro@ilsteam.com	Multi-factor Digital Fingerprint Checksum 5ea6621574da1a595d464903bcbd33e176dda5de83dc32ad9a34a5a4f330b8a4	Identity Authenticated At 08/21/2024 12:48 EDT
Components 4	IP Address 98.165.147.237	Signed At 08/21/2024 12:48 EDT
	Device Microsoft Edge via Windows	
	Drawn Signature 	
	Signature Reference ID E18FD079	
	Signature Biometric Count 5	

AUDITS

TIMESTAMP	AUDIT
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